EXHIBIT 127
Unredacted Version of Document Sought to be Sealed

From:	Matthew Melamed <mmelamed@bfalaw.com>
Sent:	Tuesday, March 15, 2022 3:04 PM
To:	Daniel Garrie; Kutscher Clark, Martie; Daniel Garrie (daniel@lawandforensics.com); Lesley Weaver; Anne Davis; Derek Loeser; Cari Laufenberg; David Ko; Chris Springer
Cc:	Ring, Rose; Stein, Deborah L.; Falconer, Russ; Davis, Colin B.; Mumm, Laura C.
Subject:	RE: In re Facebook: Contracts With Netflix, Microsoft, and YouTube
Attachments:	FB_Tasks and Quips Exemplars (#4859-5354-3188 - v4).xlsx

Counsel,

Plaintiffs provide the attached spreadsheet identifying exemplars of Tasks and Quips that have not been produced. These exemplars are provided as evidence of the need for additional production of Tasks and Quips, not to limit the extent of Facebook's production obligation to the specific documents identified.

Tasks

In the "Tasks" worksheet, Plaintiffs have identified approximately 50 exemplars of relevant Tasks, referenced in 35 produced documents, that have not been produced by Facebook. It is not a comprehensive listing of Task production gaps.

The exemplars were created by extracting Task identification numbers from references to relevant Tasks in produced materials. Each of these extracted Task numbers was run against the documents produced by Facebook, by searching the number against the Subject metadata field. Where a search resulted in 0 hits, Plaintiffs have assumed that no associated item has been produced.

Other notes regarding Tasks:

1. Documents produced so far indicate that a closed Task may be reopened at a later date. Thus, in order to ensure that Facebook is producing the complete history of any Task, it should be produced from database that houses the Task system, not from custodial email files. This is an issue with the substantial majority of Facebook's Tasks production; most Tasks have been produced from custodial email files.
2. Most Tasks include numerous Tags which identify the subject(s) involved in the Task. Many identify topics core to the case. By way of example, the tags include Cambridge Analytica and Platform Simplification. The attached spreadsheet also contains a worksheet named "Tasks-Relevant Tags" that identifies such tags. Plaintiffs ask Facebook to produce all Tasks with the listed tags. Plaintiffs further clarify that this should be a floor of the Tasks production, not a ceiling; many highly relevant tasks do not include these tags.

Quips

In the "Quips" worksheet, Plaintiffs have identified approximately 50 exemplars of references to relevant Quip files that have not been produced by Facebook. It is not a comprehensive listing of Quip production gaps.

Most were identified by extracting Quip IDs (alphanumeric strings of 11 or 12 case sensitive digits; e.g. mIbNAUk8mpD3) from references to relevant Quips made in produced materials. Each of these extracted Quip IDs was run against the entirety of the Relativity workspace of documents produced by Facebook. Where a search resulted in 0 hits, Plaintiffs assume that no associated item has been produced. Others were identified by searches for titles of Quips identified in other documents. Where searches for those names resulted in 0 hits, Plaintiffs assume that the Quip has not been produced.

Separately, though Facebook has represented it has produced numerous Quips from custodial files, Plaintiffs have identified only 165 produced Quip documents. Given Facebook's pervasive use of Quip, Plaintiffs are concerned about how few Quips it has produced. Plaintiffs identified Quips produced by Facebook by searching the documents it has produced in two ways. First, a search was conducted for items which contain the phrase "Quip Business Portal." This search identified 58 produced documents reflecting extracted comments to Quip files. Notably, those documents do not include the actual Quip file the comments address. Second, a search was conducted by employing the following search string, which is based on the template data field discovered in actual Quips reviewed to date: (Type AND participants AND labels AND "thread class" AND users). This resulted in 107 items with a false positive rate of less than 1%. Based on this finding, Plaintiffs believe they have discovered the entirety of the produced Quip population.

Thanks,
Matt

From: Daniel Garrie <DGarrie@jamsadr.com>
Sent: Tuesday, March 8, 2022 2:55 PM
To: Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Daniel Garrie (daniel@lawandforensics.com) <daniel@lawandforensics.com>; Lesley Weaver <lweaver@bfalaw.com>; Matthew Melamed <mmelamed@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; Derek Loeser <dloeser@kellerrohrback.com>; Cari Laufenberg <claufenberg@kellerrohrback.com>; David Ko <dko@kellerrohrback.com>; Chris Springer <cspringer@kellerrohrback.com>
Cc: Ring, Rose <RRing@gibsondunn.com>; Stein, Deborah L. <DStein@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Davis, Colin B. <CDavis@gibsondunn.com>; Mumm, Laura C. <LMumm@gibsondunn.com>
Subject: RE: In re Facebook: Contracts With Netflix, Microsoft, and YouTube

Counsel,

As promised, I am offering the following high-level summary of the mediation yesterday. I did my best to summarize and recognize that I may have forgotten things or incorrectly stated things and would request that both parties review and make any edits (no adjectives) in responding to the summary to ensure it is accurate.

    1. Facebook agrees to a rolling production that is to start on March 21, 2022 and complete in the timeline previously indicated.

    2. Facebook agrees to make a good faith effort to search for the data Plaintiff identified in an earlier email sent by Plaintiffs.

    3. Facebook does not intend to withhold information based on categories and will promptly notify Plaintiffs if Facebook changes its position.

With regards to specifics systems.

Quips
- Plaintiffs expressed that they were concerned Facebook relied upon custodians to identify Quips rather than searching the Quips associated or attached to a user. Plaintiff agreed to provide Facebook with examples of Quips that they believe they have not received, but are identified in other items produced by Facebook (i.e., email communications that reference Quips that appear relevant but cannot be identified/located by Plaintiffs)
- Facebook stated that they did a separate custodian-specific collection of information from Quips for the custodians.
- Facebook agreed to review and describe to Plaintiffs how Quips was searched for the custodians, including if Quips was searched in some manner beyond relying solely on the custodian's memory. Facebook also agreed to determine if they can run "string" searches (not Boolean) of Quips.

Tasks.
- Plaintiffs communicated a concern that there are Tasks that are relevant and responsive but do not involve any of the custodians and because Tasks were collected by the custodian would thus not be included in the production. Plaintiffs agreed to provide examples of Tasks that they have identified in items that have been produced but cannot be identified in the production (i.e., email referencing Tasks or Task having other tasks within them that appear relevant). Plaintiffs also agreed and did provide in the mediation testimony from Facebook engineers that describe Tasks search functionality.
- Facebook agreed to determine what search functionality was available for Tasks.

Financial documents
- Facebook agreed to look for the seven categories and produce accordingly. Facebook stated they are interviewing custodians to identify the right people to then identify the right sources to then collect, search, review, and produce.

Contracts
- Facebook represented that they are searching for the types of contracts Plaintiffs identified in a previous email.

For all items set forth above, Facebook represented that any items identified will be produced pursuant to the above schedule. Facebook and Plaintiffs both agreed to provide status updates on Cambridge Analytica studies and Interog responses this week to one another.

Thanks,
Daniel